

1 CHRISTOPHER CHIOU
Acting United States Attorney
2 Nevada Bar Number 14853
JARED L. GRIMMER
3 Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
4 Las Vegas, Nevada 89101
Tel: (702) 388-6336/Fax: (702) 388-6418
5 jared.l.grimmer@usdoj.gov
Attorneys for the United States

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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 JUAN BARAHONA-ORTEGA,
aka "Jose Luis Barahona,"
12 aka "Juan Ortega,
13 aka "Jose Ortega,"
aka "Julio Edgardo Barahona,"
14 aka "Tulio Ordenez,"
aka "Julio Edgardo Ordenez,"

15 Defendant.
16

Case No. 2:22-mj-00304-VCF

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
18 Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States
19 Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public
20 Defender, and Aden Kebede, Assistant Federal Public Defender, counsel for Defendant
21 JUAN BARAHONA-ORTEGA, that the Court direct the U.S. Probation Office to prepare
22 a report detailing the defendant's criminal history.

23 This stipulation is entered into for the following reasons:
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1 1. The United States Attorney's Office has developed an early disposition
2 program for immigration cases, authorized by the Attorney General pursuant to the
3 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
4 extended to the defendant a plea offer in which the parties would agree to jointly request an
5 expedited sentencing immediately after the defendant enters a guilty plea.

6 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
7 history until after the defendant enters his guilty plea unless the Court enters an order
8 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
9 a defendant's initial appearance when charged by indictment.

10 3. The U.S. Probation Office informs the government that it would like to begin
11 obtaining the criminal history of defendants eligible for the early disposition program as
12 soon as possible after their initial appearance so that the Probation Office can complete the
13 Presentence Investigation Report by the time of the expected expedited sentencing.

14 4. Accordingly, the parties request that the Court enter an order directing the
15 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

16 DATED this 4th day of May, 2022.

17 Respectfully Submitted,

18 RENE L. VALLADARES
19 Federal Public Defender

 CHRISTOPHER CHIOU
 Acting United States Attorney

20 /s/ Aden Kebede
21 ADEN KEBEDE
22 Assistant Federal Public Defender
23 Counsel for Defendant JUAN
24 BARAHONA-ORTEGA

/s/ Jared L. Grimmer
 JARED L. GRIMMER
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JUAN BARAHONA-ORTEGA,
7 aka "Jose Luis Barahona,"
8 aka "Juan Ortega,"
9 aka "Jose Ortega,"
10 aka "Julio Edgardo Barahona,"
11 aka "Tulio Ordonez,"
12 aka "Julio Edgardo Ordonez,"

13 Defendant.

Case No. 2:22-mj-00304-VCF

**Order Directing Probation to
Prepare a Criminal History Report**
~~[Proposed]~~

14 Based on the stipulation of counsel, good cause appearing, and the best interest of
15 justice being served:

16 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
17 report detailing the defendant's criminal history.

18 DATED this 4th day of May, 2022.



19 HONORABLE CAM FERENBACH
20 UNITED STATES MAGISTRATE JUDGE
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